

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

Leila Green Little, et al.,

Plaintiffs,

v.

Llano County, et al.,

Defendants.

Case No. 1:22-cv-00424-RP

DEFENDANTS' ANSWER

1. The defendants lack sufficient knowledge or information to determine the truth of the allegations of paragraph 1 of the complaint.
2. The defendants deny the allegations of paragraph 2 of the complaint.
3. The defendants deny the allegations of paragraph 3 of the complaint.
4. The defendants deny the allegations of paragraph 4 of the complaint.
5. The defendants deny the allegations of paragraph 5 of the complaint.
6. The defendants deny the allegations of paragraph 6 of the complaint.
7. The defendants deny the allegations of paragraph 7 of the complaint.

JURISDICTION AND VENUE

8. The defendants admit the allegations of paragraph 8 of the complaint.
9. The defendants deny the allegations of paragraph 9 of the complaint. The Declaratory Judgment Act does not confer subject-matter jurisdiction on a federal district court, and it does not in any way expand the subject-matter jurisdiction of the federal judiciary. *See Skelly Oil Co. v. Phillips Petroleum Co.*, 339 U.S. 667, 671–72 (1950); *Franchise Tax Board v. Construction Laborers Vacation Trust*, 463 U.S. 1, 10 (1983).
10. The defendants admit the allegations of paragraph 10 of the complaint.

THE PARTIES

11. The defendants lack sufficient knowledge or information to determine the truth of the allegations of paragraph 11 of the complaint.

12. The defendants lack sufficient knowledge or information to determine the truth of the allegations of paragraph 12 of the complaint.

13. The defendants lack sufficient knowledge or information to determine the truth of the allegations of paragraph 13 of the complaint.

14. The defendants lack sufficient knowledge or information to determine the truth of the allegations of paragraph 14 of the complaint.

15. The defendants lack sufficient knowledge or information to determine the truth of the allegations of paragraph 15 of the complaint.

16. The defendants lack sufficient knowledge or information to determine the truth of the allegations of paragraph 16 of the complaint.

17. The defendants lack sufficient knowledge or information to determine the truth of the allegations of paragraph 17 of the complaint.

18. The defendants lack sufficient knowledge or information to determine the truth of the allegations of paragraph 18 of the complaint.

19. The defendants admit the identity of the defendants but deny the remaining allegations of paragraph 19 of the complaint.

20. The defendants deny that defendant Ron Cunningham is a “final policy-maker.” The defendants admit the remaining allegations of paragraph 20 of the complaint.

21. The defendants deny that defendants Jerry Don Moss, Peter Jones, Mike Sandoval, and Linda Raschke are “final policymakers.” The defendants admit the remaining allegations of paragraph 21 of the complaint.

22. The defendants deny the allegations of paragraph 22 of the complaint.

23. The defendants deny that defendant Amber Milum is a “final policymaker.” The defendants admit the remaining allegations of paragraph 23 of the complaint.

24. The defendants deny that the Llano County Library Board “was created by the Commissioners Court to create and effectuate County policy.” The defendants admit the remaining allegations of paragraph 24 of the complaint.

25. The defendants deny the allegations of paragraph 25 of the complaint.

26. The defendants deny the allegations of paragraph 26 of the complaint.

FACTUAL BACKGROUND

27. The defendants deny the allegations of paragraph 27 of the complaint.

28. The defendants admit the allegations of paragraph 28 of the complaint.

29. The defendants lack sufficient knowledge or information to determine whether OverDrive “was widely and heavily used by the Llano community, particularly by elderly patrons who struggle to read books in print and listen to audiobooks instead, as well as by patrons with physical disabilities that make accessing a physical library location difficult.” The defendants admit the remaining allegations of paragraph 29 of the complaint.

30. The defendants lack sufficient knowledge or information to determine the truth of the allegations of paragraph 30 of the complaint

31. The defendants admit the allegations of paragraph 31 of the complaint.

32. The defendants admit the allegations of paragraph 32 of the complaint.

33. The defendants deny the allegations of paragraph 33 of the complaint.

34. The defendants deny the allegations of paragraph 34 of the complaint.

35. The defendants admit the allegations of paragraph 35 of the complaint.

36. The defendants deny the allegations of paragraph 36 of the complaint.

37. The defendants deny the allegations of paragraph 37 of the complaint.

38. The defendants deny the allegations of paragraph 38 of the complaint.

39. The defendants deny the allegations of paragraph 39 of the complaint.
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65. The defendants deny the allegations of paragraph 65 of the complaint.

66. The defendants deny the allegations of paragraph 66 of the complaint.

67. The defendants deny the allegations of paragraph 67 of the complaint.

68. The defendants lack sufficient knowledge or information to determine the truth of the allegations in the allegations of paragraph 68 of the complaint.

69. The defendants lack sufficient knowledge or information to determine the truth of the allegations in the allegations of paragraph 69 of the complaint.

70. The defendants lack sufficient knowledge or information to determine the truth of the allegations in the allegations of paragraph 70 of the complaint.

71. The defendants lack sufficient knowledge or information to determine the truth of the allegations in the allegations of paragraph 71 of the complaint.

72. The defendants deny the allegations of paragraph 72 of the complaint.

73. The defendants deny the allegations of paragraph 73 of the complaint.

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75. The defendants deny the allegations of paragraph 75 of the complaint.

76. The defendants deny the allegations of paragraph 76 of the complaint.

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79. The defendants deny the allegations of paragraph 79 of the complaint.

80. The defendants deny the allegations of paragraph 80 of the complaint.

81. The defendants deny the allegations of paragraph 81 of the complaint.

82. The defendants deny the allegations of paragraph 82 of the complaint.

83. The defendants deny the allegations of paragraph 83 of the complaint.

84. The defendants deny the allegations of paragraph 84 of the complaint.

85. The defendants deny the allegations of paragraph 85 of the complaint.

86. The defendants admit the allegations of paragraph 86 of the complaint.

87. The defendants deny the allegations of paragraph 87 of the complaint.

88. The defendants deny the allegations of paragraph 88 of the complaint.

89. The defendants deny the allegations of paragraph 89 of the complaint.
90. The defendants deny the allegations of paragraph 90 of the complaint.
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116. The defendants deny the allegations of paragraph 116 of the complaint.
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125. The defendants deny the allegations of paragraph 125 of the complaint.
126. The defendants deny the allegations of paragraph 126 of the complaint.
127. The defendants deny the allegations of paragraph 127 of the complaint.
128. The defendants deny the allegations of paragraph 128 of the complaint.
129. The defendants lack sufficient knowledge or information to determine the truth of the allegations in the allegations of the allegations of paragraph 129 of the complaint.
130. The defendants admit the allegations of paragraph 130 of the complaint.
131. The defendants deny the allegations of paragraph 131 of the complaint.
132. The defendants deny the allegations of paragraph 132 of the complaint.
133. The defendants admit the allegations of paragraph 133 of the complaint.
134. The defendants admit the allegations of paragraph 134 of the complaint.
135. The defendants deny the allegations of paragraph 135 of the complaint.
136. The defendants deny the allegations of paragraph 136 of the complaint.
137. The defendants deny the allegations of paragraph 137 of the complaint.

CLAIMS FOR RELIEF

138. The defendants need not admit or deny a paragraph that incorporates previous paragraphs.

139. The defendants deny the allegations of paragraph 139 of the complaint.

140. The defendants deny the allegations of paragraph 140 of the complaint.

141. The defendants deny the allegations of paragraph 141 of the complaint.

142. The defendants deny the allegations of paragraph 142 of the complaint.

143. The defendants deny the allegations of paragraph 143 of the complaint.

144. The defendants deny the allegations of paragraph 144 of the complaint.

145. The defendants deny the allegations of paragraph 145 of the complaint.

146. The defendants deny the allegations of paragraph 146 of the complaint.

147. The defendants deny the allegations of paragraph 147 of the complaint.

148. The defendants deny the allegations of paragraph 148 of the complaint.

149. The defendants need not admit or deny a paragraph that incorporates previous paragraphs.

150. The defendants deny the allegations of paragraph 150 of the complaint.

151. The defendants deny the allegations of paragraph 151 of the complaint.

152. The defendants deny the allegations of paragraph 152 of the complaint.

153. The defendants deny the allegations of paragraph 153 of the complaint.

154. The defendants deny the allegations of paragraph 154 of the complaint.

155. The defendants deny the allegations of paragraph 155 of the complaint.

156. The defendants deny the allegations of paragraph 156 of the complaint.

157. The defendants deny the allegations of paragraph 157 of the complaint.

158. The defendants deny the allegations of paragraph 158 of the complaint.

DEFENSES

1. The complaint fails to state a claim on which relief may be granted.

2. The defendants reserve the right to assert additional defenses during the pendency of this action.

Respectfully submitted.

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Dated: May 26, 2025

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CERTIFICATE OF SERVICE

I certify that on May 26, 2025, I served this document through CM/ECF upon:

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